

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TIFFANI M. SHAFFER, Civil Action  
Plaintiff, No. 19-1481  
v. Judge Wiegand  
CRANBERRY TOWNSHIP,  
Defendant.

**DECLARATION OF TIFFANI M. SHAFFER**

I, Tiffani M. Shaffer, make the following declaration to address matters not covered during my deposition:

1. The Records Management System (“RMS”) used by the Cranberry Township Police Department logs every “call” that the Department receives. “Calls” include walk in complaints, phone call requests, court time, preparing investigative reports, preparing as well as affidavits and warrants, and fingerprinting.
2. The higher number of RMS calls that the Department receives, the busier the Department is.
3. The Department has continued to need to correct and merge addresses in the RMS. Both in 2018 when I was working light duty, as well as to this day, this is approximately a daily occurrence. For example, the system is not supposed to include abbreviations. If I received a call for service at 1234 at Long Road, I need to spell out “Road.” If the system also included “1234 Long Rd,” I would need to merge the addresses with the correct long-form spelling.
4. The Department routinely receives several walk-in complaints and phone calls during daylight hours.
5. The clerical staff in the office does not personally handle walk-in complaints or phone complaints relating to police matters, as these require an officer’s response. While they are the initial point of contact for the public, they are only permitted to handle non-police matters such as permit applications and generalized community questions.
6. At no time during the period that I was on light duty did Chief Meyer ever tell me that he asked Sergeant Irvin if there were opportunities for me in the Detective’s Office. Rather, Chief Meyer only told me that I did not qualify for work in the Detective’s Office.
7. I never turned down any duties offered to me based on my own comfort level. I only expressed that I would not be comfortable returning to full duty in uniform while I was pregnant. I never said I was not comfortable doing

fingerprinting, and in fact disagreed with Chief [Case 2:19-cv-01481-COW Document 44 Filed 03/02/21 Page 2 of 2](#) when he informed me that he was taking fingerprinting away from me.

8. Based on my experience filling out timesheets, and seeing other officers' time sheets, I know that if an officer's timesheet reflects "sick," "vacation," or "comp" time, that means that the officer was scheduled to work, but decided not to work due to illness or personal preference.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

22 FEB 2021

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Date

Tiffani M. Shaffer

Tiffani M. Shaffer